

THE HONORABLE _____

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

PARS EQUALITY CENTER, et al.

Plaintiffs,

v.

MIKE POMPEO, et al.

Defendants.

No. 2:18-cv-1122

**DECLARATION OF JOHN DOE 3 IN
SUPPORT OF PLAINTIFFS' MOTION**

DECLARATION OF JOHN DOE 3

I, John Doe 3, upon my personal knowledge, hereby declare as follows:

1. I am a native-born United States citizen living in San Francisco County, California.

2. Currently I am employed in the private sector, and analyze business risk related to corporate transactions. Prior to that, I worked for the U.S. government domestically and overseas. As a result of data breaches that have occurred, my employment information and security clearance information was released and I can no longer safely travel to certain foreign countries, including Iran.

3. I met my fiancée who is an Iranian national in 2009 when we were both study abroad students in Dubai. Several years later, in 2013, our paths crossed again when she was living in Oman and I was stationed at a U.S. embassy in the Middle East. We began seeing each other and became engaged to be married in 2017.

1 4. In April 2018, I filed an I-129F petition on behalf of my fiancée so that she
2 could join me in the United States where we planned to be married and build our lives
3 together. My petition was granted and shortly after, my fiancée applied for a K-1 fiancée visa.

4 5. When we received notice that she should schedule her consular interview I was
5 very excited because I believed that meant her visa would soon be approved and we would be
6 reunited in the United States. Unfortunately, those hopes were dashed whereupon
7 immediately after her consular interview, the consular officer handed her a notice indicating
8 that her visa was denied because of the Presidential Proclamation and that a waiver would not
9 be granted in her case.

10 6. I am fearful that my participation in this lawsuit against United States federal
11 government officials could jeopardize my fiancée's chances for a waiver and a visa. I do not
12 want my participation in this lawsuit to adversely impact her chances of coming to the United
13 States so that we can be married and begin our life together.

14 7. I am also afraid that using my real name in this lawsuit would make it easy to
15 identify and target my fiancée, and I have reason to believe that my affiliation with the U.S.
16 government, if made known to the Government of Iran, would put my fiancée and her family,
17 some of whom reside in Iran, in danger. Some extreme factions in Iran portray any association
18 with the United States as a threat and I am fearful that if my fiancée were to become publicly
19 associated with me, she could become a target.

20 8. In addition, in Iran relationships between members of different faith
21 communities is not viewed favorably. Because my fiancée is Muslim and I am a member of a
22 different faith community, I am worried that publicizing our engagement through our
23 participation in this lawsuit could make her a target of harassment and intimidation.

24 9. While most of my fears relate to the impact that publically revealing my
25 participation in this lawsuit would have on my fiancée and her family in Iran, I am also fearful
26 that if I use my name in this lawsuit, which relates to a highly sensitive topic roiled in political
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1 debate, the potential attention it might receive will expose me to harassment or discrimination
2 and might jeopardize my future job opportunities. For example, if in the future I seek
3 employment with the U.S. government, I am worried my association with this lawsuit could
4 jeopardize my ability to secure a position.

5 10. For these reasons, I feel that my and my fiancée's well-being, and the outcome
6 of her visa application and eligibility for a waiver, necessitates that I be allowed to proceed
7 under a pseudonym.

8 I declare under penalty of perjury and under the laws of the United States that the
9 foregoing is true and correct. Executed in [REDACTED], California on July 26, 2018.

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11 [REDACTED]
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CERTIFICATE OF SERVICE

Pursuant to RCW 9A.72.085, the undersigned certifies under penalty of perjury under the laws of the United States and the laws of the State of Washington, that on the 31st day of July, 2018, the foregoing document was served on the following individuals in the manner set forth below: N/A

and I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants:

Michael R. Pompeo c/o United States Department of State 2201 C Street NW, Room 4330, Washington DC 20037	Kirstjen Nielsen c/o United States Department of Homeland Security 3801 Nebraska Ave NW Washington DC 20016
Kevin McAleenan c/o United States Customs and Border Patrol 1300 Pennsylvania Ave. NW Washington, DC 20229	United States Department of Homeland Security 3801 Nebraska Ave NW Washington DC 20016
United States Department of State 2201 C Street NW, Room 4330, Washington DC 20037	United States Customs and Border Protection 1300 Pennsylvania Ave. NW Washington, DC 20229

Executed on the 31st day of July, 2018, at Seattle, Washington.

s/ Jessica Walder
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